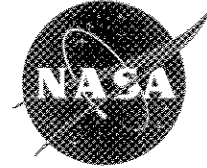


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 26, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-133  
Pre-Launch Reception hosted by Jacobs on October 31, 2010

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by Jacobs at the Hilton Hotel Atlantis Restaurant in Cocoa Beach, Florida, on October 31, 2010, from 8:00p.m.-11:00 p.m. The purpose of the event is to celebrate the launch of STS-133 and to discuss the U.S. space program with industry, academia, the public, and our elected officials.

This event will be a widely-attended gathering of approximately 300 representatives of government, the aerospace industry, academia, and the public. Food and refreshments will be served at a cost of approximately \$15.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above-mentioned reception is in the interest of the agency because it will further agency programs and operations.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect Jacobs, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

Moreover, NASA employees, who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, may only attend if they reimburse the sponsors the cost of the food they and any accompanying guest consume at the reception for themselves and their invited guests.

*Kathleen T. Spear*

*for* Adam F. Greenstone